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9 UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA

10 1350 West 1st Street, Los Angeles, CA 90012

11 Case No.: [Insert Case Number]

12 Don Macallister, Founder of Vehicle BNB Inc., Pro Se Plaintiff

13 v.

14 Defendants:

- 15 • City of Los Angeles
16 • Los Angeles Homeless Services Authority (LAHSA)
17 • California Department of Housing & Community Development (HCD)
18 • Gustavo Velasquez, Director, CA Housing Department
19 • Los Angeles County Board of Supervisors
20 • California Governor Gavin Newsom
21 • U.S. Department of Housing & Urban Development (HUD) – Regional Office
22 • HUD Secretary Adrienne Todman

23

24 PRO SE COMPLAINT AND DEMAND FOR EMERGENCY
25 RELIEF

26 I. INTRODUCTION: A CRISIS IGNORED, A DUTY BETRAYED

27 Defendants have willfully ignored, misrepresented, and excluded a faster, safer, lower-cost
28 housing solution—Vehicle BNB Inc.—which could immediately provide shelter to thousands of
29 unhoused individuals, wildfire victims, veterans, and families.

30 While Los Angeles collapses under a homelessness crisis and wildfires leave thousands more
31 without shelter, Defendants have knowingly blocked an immediate, scalable private-sector
32 solution in favor of slow, bloated, billion-dollar projects that have failed for decades.

33 Plaintiff Don Macallister, Founder of Vehicle BNB Inc., brings this lawsuit to hold public officials
34 accountable for:

- 35 Their failure to act in good faith
36 Their exclusion of superior private-sector solutions
37 The financial harm inflicted on taxpayers due to their refusal to evaluate proven alternatives

38 II. THE CORE LEGAL QUESTIONS BEFORE THE COURT

39 This case presents a critical legal question:

- 40 1. Do Defendants have a legal duty to fairly evaluate all viable, proven solutions—including
41 private-sector alternatives like Vehicle BNB—on an equal basis with government-backed
42 programs?
43 2. Does the refusal to consider a viable solution constitute gross negligence and breach of
44 duty?
45 3. Should taxpayer dollars continue funding projects that cost up to \$837K per unit while
46 Vehicle BNB offers emergency housing for a fraction of the cost—deployed within 30
47 days?

48  Thousands of lives hang in the balance. The Court must answer.

49

50 III. JURISDICTION & VENUE

51 Jurisdiction is proper under 28 U.S.C. § 1331, as this case raises federal questions regarding
52 the misallocation of federal housing funds.

53 Venue is appropriate in the Central District of California, where this crisis is unfolding.

54

55 IV. FACTUAL ALLEGATIONS

56 1. Plaintiff's Background & Expertise

- 57 • Founder & CEO of Vehicle BNB Inc.
58 • U.S. Congressional Tribute Honoree
59 • Lived Experience Overcoming Homelessness → Now leading a proven, scalable
60 housing solution

61 2. The Urgent Crisis Defendants Are Ignoring

- 62 California's homeless population has surpassed 200,000 despite record taxpayer spending
- 63 Wildfires have left thousands newly homeless
- 64 Los Angeles' \$3B homelessness settlement has collapsed
- 65 The Supreme Court has ruled cities must clear encampments
- 66 Yet Defendants are blocking an immediate, lower-cost solution—leaving people to suffer

67 3. Vehicle BNB: The Immediate Solution Officials Are Blocking

- 68 Vehicle BNB deploys climate-controlled Tesla Model 3 units as dignified emergency housing with:
- 70 WiFi, showers, restrooms
- 71 Rapid deployment—ready within 30 days
- 72 Tracked success metrics: Cost per guest per night, number housed per night
- 73 A fraction of the cost of failed government projects

74 4. The Numbers Don't Lie: Cost Per Guest, Per Night

Model	Cost Per Night (Per Person)	Total Monthly Cost (100 Guests)	Upfront Cost	Deployment Time
Vehicle BNB (Tesla Units)	\$83.33	\$250,000	\$25,000	30 Days
Traditional Housing (100 Units)	\$141.67	\$425,000	\$50M (\$500K per unit)	5+ Years

- 75 Vehicle BNB is ready NOW.
- 76 Defendants' plan takes 5+ years.
- 77 Every day of inaction = more suffering, more waste.

78

79 V. DEFENDANTS' BREACH OF DUTY & PUBLIC MISMANAGEMENT

- 80 Despite their public commitment to solving homelessness, Defendants have:
- 81 Refused to engage with private-sector alternatives like Vehicle BNB
- 82 Continued funding bloated government projects costing up to \$837K per unit
- 83 Ignored wildfire victims and left families on the streets

- 84 State auditors found that California has failed to track the effectiveness of billions in homeless funding. This further supports the claim that Defendants are mismanaging public resources and excluding more effective solutions.

87

88 VI. PLAINTIFF'S REPEATED ATTEMPTS TO ENGAGE OFFICIALS

89 Sept. 13, 2024 – Filed Friend of the Court Brief → Ignored.
90 Sept. 20, 2024 – Contacted CA Attorney General Rob Bonta → No response.
91 Sept. 29, 2024 – Contacted State Housing Director Gustavo Velasquez → No follow-up.
92 Oct. 12, 2024 – Proposal to LA County Supervisor Lindsey Horvath → Ignored.
93 Sept. 9, 2024 – Spoke with Matthew Umhofer, lead attorney for LA Alliance →
94 Acknowledged, but stalled.

95 This is not negligence—it is a deliberate blockade.

96

97 VII. CAUSES OF ACTION

98 Count 1: Violation of Duty & Misrepresentation

99 Defendants falsely portray slow, expensive projects as the only solution while ignoring faster,
100 lower-cost alternatives like Vehicle BNB.

101 Count 2: Gross Negligence & Financial Harm to Taxpayers

102 By refusing to consider a proven, cost-effective alternative, Defendants' actions have directly
103 cost taxpayers billions while leaving vulnerable populations without shelter.

104 Count 3: Equal Protection Violation (14th Amendment)

105 By excluding private-sector solutions and favoring government-backed projects, Defendants
106 have arbitrarily denied equal opportunity to innovative alternatives.

107

108 VIII. RELIEF SOUGHT

109 Plaintiff demands:

110 1 Public Disclosure & Evaluation of Vehicle BNB as an equal alternative to traditional housing.
111 2 A court-ordered injunction requiring Los Angeles to evaluate and pilot Vehicle BNB
112 immediately.

113 3 \$2 Billion in Damages:

114 \$1B for blocking Vehicle BNB from entering the market
115 \$1B for financial harm to taxpayers due to failed government policies
116 4 A Federal Audit of all homelessness funds spent in California since 2020.

117

118 IX. CONCLUSION: THE COURT MUST ACT

119 🚧 Wildfire victims are sleeping on sidewalks.

120 🚧 Veterans remain in encampments.

121 🚧 Taxpayers foot the bill for wasteful, ineffective projects.

122 🔊 Vehicle BNB could be housing thousands RIGHT NOW—but officials refuse to act.

123 The Court must intervene and hold Defendants accountable before more lives are lost.

124 Dated: [Insert Date] *March 20th, 2025*

125 Respectfully submitted,



126 Don Macallister, Pro Se Plaintiff

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